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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE PRESENTATION

December 23, 1997

SERVICE BY HAND

Regina Keeney, Chief
International Bureau
Federal Communications Commission
2000 M Street, N.W.
Washington, D.C. 20554

Re: SkyBridge L.L.C.
File Nos. 48-SAT-P/LA-97; 89-SAT-AMEND-97 RM No. 9147

Dear Ms. Keeney:

In an ex parte letter to you dated December 9, 1997, counsel to SkyBridge L.L.C. asks the Commission to "treat SkyBridge in a nondiscriminatory manner" and to "move forward expeditiously" on the above-captioned matters with the issuance of a cut-off notice on the SkyBridge application and an NPRM on the SkyBridge rulemaking proposal.

The Fixed Point-to-Point Communications Section, Wireless Communications Division, of the Telecommunications Industry Association (the "Fixed Section") questions SkyBridge's inference that the Commission's handling of the above-captioned matters has somehow been prejudicial, and urges the Commission to continue the course it has followed thus far. As the Fixed Section and other parties commenting on SkyBridge's application and Petition for Rulemaking have noted, the SkyBridge proposal fails to address adequately critical questions regarding the ability of its NGSO network to share spectrum with FS and other authorized services. As currently framed, the proposal if approved would jeopardize thousands of FS operations across the country, and their ability to expand in response to market demand and public need.

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Regina Keeney
December 23, 1997
Page 2

Noting the shortcomings in SkyBridge's filings thus far, a coalition of GSO satellite interests (the "Satellite Coalition") have recently filed a Petition to defer action on the SkyBridge application, and requesting the Commission to direct SkyBridge to provide detailed technical information on its proposal. The Fixed Section shares the concerns expressed by the Satellite Coalition and is in the process of filing Comments not only supporting their position, but also requesting the Commission to direct SkyBridge to provide additional technical information to evaluate the SkyBridge proposal from the standpoint of the terrestrial fixed service industry. These actions will enable the Commission and interested parties to analyze the SkyBridge proposal more effectively, and in no way prejudice SkyBridge's interests. On the contrary, they would serve the public interest by enabling the Commission to render a reasoned, informed decision on SkyBridge's filings, on the basis of a complete record.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Fishman".

Eric Fishman
Leonard R. Raish

Counsel to
The Fixed Point-to-Point Communications Section,
Wireless Communications Division, of the
Telecommunications Industry Association

ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of Application of)	
)	
SKYBRIDGE L.L.C.)	File Nos. 48-SAT-P/LA-97
)	89-SAT-AMEND-97
For Authority to Launch and Operate a)	
Global Network of Low Earth Orbit)	
Communications Satellites in the)	
Fixed Satellite Service)	

COMMENTS ON
JOINT PETITION TO DEFER ACTION
PENDING SUBMISSION OF FURTHER INFORMATION

In a Joint Petition filed December 15, 1997, a coalition of GSO FSS and BSS operators (the "Satellite Coalition") has asked the Commission to defer action on the above-referenced application of SkyBridge L.L.C. pending establishment of an analytic model for evaluating proposed NGSO sharing methodologies generally, and submission by SkyBridge of adequate technical information to allow the Commission and interested parties to analyze and comment upon the specific sharing methodology SkyBridge puts forth in its application. To assist with this proposed process, the Satellite Coalition appended to its pleading a list of questions providing a preliminary basis for such a model.

The Fixed Point-to-Point Communications Section, Wireless Communications Division, of the Telecommunications Industry Association (the "Fixed Section")¹ hereby

¹ The Telecommunications Industry Association ("TIA") is the principal industry association representing all telecommunications equipment manufacturers, including manufacturers of terrestrial fixed point-to-point microwave radio service ("FS") equipment. Fixed Section members serve, among others, companies, including telephone carriers, utilities, railroads, state and local governments, and cellular carriers, licensed by the Commission to use private and common carrier bands for

reiterates its support of the relief sought by the Satellite Coalition. See Fixed Section Comments on SkyBridge application, footnote 2. As the Fixed Section has demonstrated in its Comments on SkyBridge's application, SkyBridge thus far has failed to demonstrate that its proposed NGSO system can operate on frequencies used by terrestrial fixed services without causing harmful intersystem interference and jeopardizing the ability of FS licensees to expand their systems in response to ever-mounting market demand. In light of the billions of dollars invested by FS operators and their customers in FS facilities, and the substantial public interest functions which many of these facilities address, Fixed Section Comments at pp. 5-8, the Fixed Section agrees with the Satellite Coalition that SkyBridge's application should be deferred pending the submission of further information by SkyBridge.


In this connection, the Fixed Section hereby takes this opportunity to supplement the "Initial List of Technical Information Required to Evaluate SkyBridge Proposal" appended to the Joint Petition with the attached technical questions which seek vital information on the impact of the SkyBridge and other similar NGSO systems on FS operations. The Fixed Section respectfully submits that the provision of such information, and responsive analyses thereto by the FS industry, will allow the Commission to make a reasoned decision on those aspects of the SkyBridge proposal concerning FS frequency sharing, and urges the Commission to require SkyBridge to submit detailed answers to

provision of important and essential telecommunications services.

these questions simultaneously with its responses to the "Initial List of Technical Information" prepared by the Satellite Coalition.

Respectfully submitted,

FIXED POINT-TO-POINT COMMUNICATIONS DIVISION,
WIRELESS COMMUNICATIONS SECTION,
TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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December 23, 1997

ADDITIONAL TECHNICAL INFORMATION
REQUIRED TO EVALUATE SKYBRIDGE PROPOSAL
(SHARING WITH TERRESTRIAL FIXED SERVICES)

1. At pages 2-3 of its Application, SkyBridge claims that its “novel system architecture” is “designed to ensure that it will not interfere with any other service, including ... terrestrial systems....” The Fixed Section would like SkyBridge to be more specific and list these new system architecture features that would distinguish SkyBridge from other FSS systems sharing with the FS.
2. SkyBridge should reconcile its statements that there will “be no significant reduction in the ability of existing FS operators to add new links to their systems,” Petition, p. 12, and that its proposal “will not significantly inhibit expansion of FS networks,” Reply Comments, p. 22, with its earth station coordination model, which creates +/- 25° exclusion zones of infinite distance at each future SkyBridge Gateway site. See Amendment, pp. 21, 31-34.
3. Why does SkyBridge use 32-25 log (tetat) only in certain cases to determine Gateway side lobe antenna gain? Compare Table C-19 of p. 30 of Amendment to Table C-20, p. 33.
4. Why does SkyBridge propose a minimum Gateway antenna elevation angle of 6° in Table C-19 (Amendment, p. 30, Appendix C) when 10° is used in Table C-15 (Amendment, p. 22)?
5. Given the practical impossibility of moving Gateway stations once they have been deployed, what are the earth station siting restrictions and interference avoidance techniques that SkyBridge proposes to follow to preserve FS capability to expand in the 11 and 18 GHz bands?
6. Will SkyBridge recognize that ITU and FCC out-of-band emission limits are not enough to allow un-interfered operation of two different radio services operating in adjacent RF channels? Will SkyBridge provide extra transmit filtering and/or guardbands to protect adjacent FS operations?
7. What process does SkyBridge propose to use to propose and confirm adoption of a short term interference I/N objective by the United States FS industry?

CERTIFICATE OF SERVICE

I, Eric Fishman, hereby certify that on this 23rd day of December, 1997, I caused copies of the foregoing Comments on Joint Petition to Defer Action Pending Submission of Further Information of the Fixed Point-to-Point Communications Section, Wireless Communications Network Equipment Division, Telecommunications Industry Association to be mailed via first class postage prepaid mail to the following:

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